

IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF PENNSYLVANIA

NOAH SYSTEMS, INC.,)	Civil Action No. _____
Plaintiff,)	Filed Electronically
)	
vs.)	[JURY TRIAL DEMANDED]
)	
INTUIT INC.,)	
Defendant)	

COMPLAINT

Plaintiff, NOAH Systems, Inc. ("NOAH"), through its counsel, Pietragallo, Gordon Alfano Bosick & Raspanti, LLP, hereby alleges the following for its complaint against Defendant, Intuit Inc. ("Defendant" or "Intuit"):

THE PARTIES

1. Plaintiff, NOAH, is a corporation organized and existing under the laws of the Commonwealth of Pennsylvania with offices located at 2045 Murdstone Road, Pittsburgh, Pennsylvania 15241.

2. Upon information and belief, Defendant, Intuit, is a corporation organized and existing under the laws of the State of Delaware with offices located at 2535 Garcia Avenue, Mountain View, California 94039. Intuit is doing business, has carried out substantial business, and has had substantial contacts with this judicial district.

JURISDICTION AND VENUE

3. This Complaint alleges patent infringement under the Patent Act, 35 U.S.C. § 271, *et seq.*

4. This Court has subject matter jurisdiction pursuant to 28 U.S.C. §§ 1331, 1338, and 2201.

5. Venue is proper in this judicial district under 28 U.S.C. §§ 1391 and 1400(b).

PATENT INFRINGEMENT

6. Plaintiff, NOAH, is the owner by assignment of United States Patent No. 7,822,657 (“the ‘657 Patent”), issued October 26, 2010, and titled “Automated Accounting System”. A true and correct copy of the ‘657 Patent is attached hereto as Exhibit A.

7. The ‘657 Patent discloses and claims innovative and valuable inventions relating to financial accounting systems for providing financial accounting statements.

8. Intuit has infringed, contributorily infringed and/or actively induced infringement, and is infringing, contributorily infringing and/or actively inducing infringement of the ‘657 Patent in the United States by at least making, using, offering to sell, selling, importing, causing to be made, causing to be used, causing to be offered for sale, causing to be sold and/or causing to be imported systems that infringe one or more of the claims of the ‘657 Patent. Such infringement includes Intuit’s accounting/ledger products and services, including but not limited to those provided under the “QuickBooks” designation and/or the “Quicken” designation.

9. By reason of the foregoing, Plaintiff has been damaged and will continue to be damaged, and has suffered and will continue to suffer irreparable loss and harm.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff, NOAH, prays:

- A) that Intuit, its officers, agents, servants and employees be preliminarily and permanently enjoined from infringing Plaintiff's '657 Patent pursuant to 35 U.S.C. § 283;
- B) that a judgment be entered that Intuit has infringed Plaintiff's '657 Patent;
- C) that Intuit be found liable to Plaintiff for its acts of infringement and be ordered to pay damages pursuant to 35 U.S.C. § 284 as a result of infringement of Plaintiff's '657 Patent, and all damages suffered by Plaintiff as a result of the infringement;
- D) that Plaintiff be awarded its costs and prejudgment interest on all damages pursuant to 35 U.S.C. § 284; and
- E) that Plaintiff be awarded such further relief as the court may deem appropriate.

Respectfully submitted,

Dated: October 26, 2010

/s/ Eric G. Soller
Eric G. Soller
Pa. I.D. No. 65560
Alan G. Towner
Pa. I.D. No. 67984

PIETRAGALLO GORDON ALFANO BOSICK
& RASPANTI, LLP
One Oxford Centre – 38th Floor
301 Grant Street
Pittsburgh, PA 15219

Attorneys for Plaintiff
NOAH Systems, Inc.